

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA

Plaintiffs,

v.

COMMONWEALTH OF PUERTO RICO,
et. al.

Defendants.

CIVIL NO. 12-2039 (GAG)

**MOTION SUBMITTING GOVERNMENT OF PUERTO RICO WRITTEN STATEMENTS
FOR THE MAY 22, 2017 PUBLIC HEARING**

TO THE HONORABLE COURT:

COME NOW the Commonwealth of Puerto Rico and the Puerto Rico Police Department, through the undersigned counsel, and respectfully allege and pray as follows:

1. This Honorable Court ordered that all deponents for the Public hearing must submit their written statements to the court on or before May 19, 2017 before noon. (See Dockets No. 511 and 521)

2. However, Defendants were not able to comply with the Court's noon deadline because the undersigned was appearing in an initial scheduling conference in case Editorial Panamericana, Inc. et al vs. Commonwelath of Puerto Rico, et al, 16-3086.

3. Therefore, Defendants apologize for any inconvenience that the aforementioned situation may have caused and hereby submit the Government of Puerto Rico written statements as Exhibit 1.

WHEREFORE, Commonwealth of Puerto Rico respectfully requests that this Honorable Court accepts the aforementioned written statements.

IT IS HEREBY CERTIFIED that on this same date the instant document has been filed with the Court's CM/ECF System, which will simultaneously serve notice on all counsels of record to their respective registered e-mail addresses.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this May 19th, 2017.

WANDA VAZQUEZ GARCED
Secretary of Justice

WANDYMAR BURGOS VARGAS
Acting Deputy in Charge of
General Litigation

SUSANA PENAGARICANO BROWN
Acting Director of Federal Litigation
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